

26 February 2021

The Hon Richard Wynne MP
Minister for Planning
Level 16, 8 Nicholson Street
EAST MELBOURNE VIC 3002

By email: Richard.wynne@minstaff.vic.gov.au

Dear Minister Wynne,

**UDIA Victoria Submission: Environmentally sustainable development of buildings and subdivisions
– A roadmap for Victoria’s planning system (ESD Roadmap)**

The Urban Development Industry of Australia, Victoria Division (UDIA Victoria) is a non-profit advocacy, research and educational organisation supported by a membership of land use and property development organisations, across the private sector and Victoria’s public service. We are committed to working with both industry and Government to deliver housing, infrastructure, and liveable communities for all Victorians.

We welcome the opportunity to review and comment on the ESD Roadmap paper and the draft Policy Framework changes. We consider that the roadmap comprehensively outlines current policy background, providing context and further references, and clearly identifies gaps with reference to current sustainability practices and initiatives, including that outlined in Plan Melbourne (2017).

While we generally support the proposed changes to the PPF, we make the following observations and recommendations for consideration, with a focus on achieving standardisation across the councils to give the development industry a reasonable degree of certainty with regards to ESD.

Overarching feedback

Overall, the suggested improvements are sensible, well written and welcome. However, we are disappointed to see the document adopts a relatively narrow definition of Environmentally Sustainable Development (ESD), missing an opportunity to incorporate several ESD-related elements not well covered in the planning scheme at present.

The opportunity exists here for policy to address the repercussions of COVID-19, and reflect the new post-COVID life that appears to be evolving, specifically we suggest:

- Greater emphasis on 20-minute neighbourhoods, social, financial, and mental health outcomes would provide a more holistic representation of ESD;
- The framework be greater informed by the United Nations Sustainable Development Goals, which has strong synergy with the work Government has done through their 20-minute neighbourhoods strategy and which also appear in the draft Planning Structure Plan guidelines;
- Greater attention to subdivisions, especially within the executive summary, which appears to be focussed on buildings. The design of subdivisions and infrastructure can have a huge

impact on supporting sustainable transport options, reducing the carbon emissions, and reducing urban heating effects and sustainable buildings and communities;

- Greater focus on the climate change discussion, specifically net zero emissions. The Victorian Government and a growing number of councils have made commitments and timeframes to achieve net zero emissions, as have many countries in the world. For this document to primarily focus on energy efficiency, is to only set goals for an improvement in current practices, rather than with consideration for broader climate change commitments. Net zero emissions is the current widely accepted target, not just reduced emissions;
- Greater emphasis on future-proofing developments and seeking to phase out the use of fossil fuels. While renewables are supported in the document, including fossil fuels in developments perpetuates fossil fuel use, given it is expensive and difficult to change fuel sources once a development is complete. The document should better encourage developments to use sources of fuel that can be renewable (i.e. electricity) and to form a whole development clean energy strategy/plan;
- A focus on the advancement of smart cities within the framework of the Victorian planning system. We believe the use of technology and data to accelerate the outcomes of the UN Sustainable Development Goals is a significant opportunity to shape greater outcomes for buildings and subdivisions within the state. Planning and design practices have the opportunity to leverage the benefit of tools such as the Internet of Things, artificial intelligence and Digital Twins, and these should be incorporated into the planning reforms and amendments;
- It should be recognised that currently, utility companies and local government engineering departments in particular often present barriers to achieving ESD goals, especially with respect to greenfield clean energy initiatives. We recommend the planning scheme be better utilised to prevent these barriers to sustainability and innovation;
- A primary focus be on the implementation of ESD policy, which requires significant consideration. Education is key for the community, developers and councils to successfully understand and implement sustainability objectives – and at a council level in particular, to minimise unnecessary conflict between departments and impediments to innovation; and
- A focus on achieving reasonable standardisation across the councils to give the development industry certainty with regards to ESD.

Clause specific parameters

At a more detailed level, UDIA Victoria submits the following recommendations to specific clauses within the document:

Clause 01

UDIA Victoria recommends the following addition to this clause:

Ensure planning processes utilise appropriate technology and data solutions to enable greater efficiencies and better outcomes for health and wellbeing, transportation and environmental protection.

Invest in emerging tools and practices such as artificial intelligence to generate greater insights for

better decision making and building Digital Twin capabilities to ensure the most optimum building and community designs will be encouraged.

Clause 11 – Settlement

We recommend settlement to include the goals of planning as:

- identifying the benefits of density in the provision of infrastructure, efficiency of services, efficiency of transport, reduction of urban sprawl, improved opportunities for active transport, and maintaining a 20 minute neighbourhood;
- encouraging a preference for non-fossil fuel energy sources; and
- encouraging developments to prepare for/outline a plan, at the time of development, for a net zero emissions operational energy use future (no timeframe need be set).

Clause 11.01-1S

We emphasise that density is a critical primary element of delivering sustainable communities, that consideration to encouraging density of settlements should be a clear focus of ‘Strategies’ list within this clause.

Additionally, we recommend under this point:

Deliver networks of high-quality integrated settlements that have a strong identity and sense of place, are prosperous and are sustainable by:

The addition of:

- Utilising appropriate technology and data solutions to enable greater efficiencies and better outcomes for health and wellbeing, transportation and environmental protection.

Clause 11.02-2S Structure planning

Under the Strategies sub-heading, we recommend the following addition:

- Ensure planning processes utilise appropriate technology and data solutions to enable greater efficiencies and better outcomes for health and wellbeing, transportation and environmental protection; and
- Invest in emerging tools and practices such as artificial intelligence to generate greater insights for better decision making and building Digital Twin capabilities to ensure the most optimum building and community designs will be encouraged.

Clause 13.01-3S Urban heat mitigation

Under the Strategies sub-heading, we recommend the following addition:

- Targets are to be set for relevant minimums for canopy coverage and / or light surfaces for public open space paths, roads, and other hard stand areas. The targets need not be specified in the planning clauses, however that they should be set by individual councils.

Clause 15 Build environment and heritage

We recommend the following addition:

Planning must support development that is environmentally sustainable and:

- encourage a preference for non-fossil fuel energy sources; and
- encourage developments to prepare for/outline a plan, at the time of development, for a net zero emissions operational energy use future.

Clause 15.01-2S Building design

Under the point:

Improve the energy performance of buildings through siting and design measures that support:

We recommend the addition of:

- encourage a preference for non-fossil fuel energy sources; and
- encourage developments to prepare for/outline a plan, at the time of development, for a net zero emissions operational energy use future.

Clause 15.01-3S Subdivision design

Under the point:

Creating an urban structure and providing utilities and services that:

We recommend the addition of:

- encourage a preference for non-fossil fuel energy sources.

Clause 18.02-1S Sustainable personal transport

Under the point:

Encourage building and subdivision layout and design responses that:

We recommend the addition of:

- Require a separate off-road paths plan be provided with subdivision submissions, to demonstrate paths are continuous, connected, and direct between key destinations within subdivisions and between subdivisions.

Clause 18.02-2S Public transport

Under the Strategies sub-heading, we recommend the following addition:

- Where possible locate public transport stops in highly visible locations and provide adequate shelter against the elements.

We thank you for the opportunity to engage in this important consultation process and look forward to discussing the matters raised in this submission in the next phase of the ESD Roadmap engagement process. Please contact Hyatt Nidam, Engagement and Communications Manager via hyatt@udiavic.com.au to do so.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'AGaedke'.

Angela Gaedke
Acting Chief Executive Officer
Urban Development Institute of Australia, Victoria
P: 0400 088 158
E: anglea@udiavic.com.au